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Counsel for Defendant **Bryan Lee**

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

* * *

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

NEIL SURESH CHANDRAN and BRYAN
LEE

Defendants.

Case No. 4:22-CR-03077-JMG-CRZ

**DEFENDANT BRYAN LEE'S MOTION FOR JOINDER TO DEFENDANT
CHANDRAN'S MOTION TO TRANSFER VENUE TO THE DISTRICT OF
NEVADA (ECF No. 99)**

MOTION TO TRANSFER VENUE

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2 1. On July 6, 2023, co-defendant Neil Suresh Chandran filed a Motion to
3 Transfer Venue. (See Electronic Court Filing (ECF) No. 99.) Mr. Chandran
4 concurrently filed a Brief in Support of Motion to Transfer Venue. (See ECF No.
5 100.)

6 2. That counsel for defendant Bryan Lee has reviewed both filings and hereby
7 joins, adopts, and incorporates all of the arguments presented therein including any
8 relevant exhibits and attachments.

9 3. That Mr. Lee respectfully requests that this Court allow him to join Mr.
10 Chandran's Motion to Transfer Venue and that this Court transfer the instant
11 prosecution to the District of Nevada pursuant to Federal Rule of Criminal Procedure
12 21(b).

13 4. That Mr. Lee is filing a brief in support of his Motion for Joinder
14 contemporaneously with this Motion. In that brief, Mr. Lee maintains that the Mr.
15 Chandran's argument for a venue change to the District of Nevada is well-supported
16 by the law and factual record. Further, those arguments apply with more force to
17 Mr. Lee because, *inter alia*, he currently lives and resides in Las Vegas, his counsel
18 resides in Las Vegas, and the government indicted Mr. Lee recently thereby reducing
19 any risk of undue delay attendant to transferring the matter.

20 5. That counsel for Mr. Lee respectfully requests to be present for any hearings
21 or matters set regarding the pending Motion to Transfer Venue.

WHEREFORE, Mr. Lee respectfully requests that this Court allow him to join Mr. Chandran's Motion to Transfer Venue to the United States Court for the District of Nevada and that this Court grant that Motion pursuant to the terms and requirements of Federal Rule of Criminal Procedure 21(b).

/s/ Joshua Tomsheck
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CERTIFICATE OF SERVICE

I hereby certify that on July 14, 2023, I electronically filed the foregoing with the Clerk of the Court for the United States District Court, District of Nevada by using the CM/ECF system.

Participants in the case who are registered CM/ECF users will be served by the CM/ECF system and include: AUSA William Johnson.

I further certify that defendant Bryan Lee is not a registered CM/ECF users. I will ensure that this office provides Mr. Lee with a copy of this pleading at or about the time of filing.

/s/ Sarah Daniels

An Employee of Hofland & Tomsheck
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